

Product Performance Data Evaluation Review (DER)  
by Kevin Sweeney, Senior Entomologist, IB

*Kevin Sweeney*  
10/2/06

Date: October 2, 2006

Reviewer: Ann Sibold

PM: Richard Gebken, PM 10

Product: Phantom Termiticide-Insecticide

EPA Reg. No. 241-392

Dec. No. 367141

DP #: 330380

Active Ingredient: chlorfenapyr 21.45 %

Application rates: 0.125% and 0.25% for termite control; up to 0.5% for general pest control.

Use patterns: residential and commercial termiticide and general pest control.

Request: review reply to April 22, 2006 efficacy review and submissions dated June 13 and September 22, 2006 to add the pre-construction termiticide use pattern, new pests, and language changes to the existing label. ASPCRO comments from the Termiticide Labeling Review Committee are included.

Studies submitted for these actions: none

**Entomologist's Recommendation:**

1. The addition of the pre-construction use pattern for termite control is acceptable at the 0.25% dilution only. The registrant's proposal to treat the inside perimeter and sub-slab sections of a structure with a 0.25% dilution but the outside perimeter with a 0.125% dilution is impractical because applicators use only one tank mix to make preconstruction applications. The 0.125% dilution was also much less efficacious when compared to the 0.25% dilution in the USDA-FS test sites and should be retained for remedial treatments only.



**Note:** ASPCRO is willing to accept the use of two different dilutions.

**However, I advise against acceptance for the reasons stated above.**

2. On page 10 remove the statement, "The actual depth of treatment will vary depending on soil type, degree of compaction, and location of termite activity." The label already mentions exceptions to treating to the top of the footer or to a depth of four feet.
3. On page 13 remove the statement, "Use rod to treat soil to desired depth."
4. On page 16 the language for wells and cisterns is confusing. Is the setback from wells and cisterns 5 or 10 feet? I remember EFED asking for a 5 foot setback.
5. In bullet 3 on the same page, is the statement concerning consultation with agencies a mandatory or advisory statement? The registrant is proposing a change from mandatory to advisory language.